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March 21, 2019

Jaynellen Holloway  
City of Watertown  
106 Jones Street  
Watertown, WI 53094

Subject: Proposed Soil Removal Activities in the South 3<sup>rd</sup> Street Right of Way  
City of Watertown, WI 53098

Dear Ms. Holloway:

As you know, our client, SPX Corporation (SPX), has been cooperating with the Wisconsin Department of Natural Resources (WDNR) to evaluate and, if necessary, remediate soil impacted with polychlorinated biphenyls (PCBs) at the former Lindberg MPH Facility (304 Hart Street, Watertown, Wisconsin). Information about this site is available in the WDNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) online, as site # 02-28-555133. On May 25, 2018, TRC provided you with a copy of a letter that was sent to the property owners of [REDACTED] South 3<sup>rd</sup> Street, notifying them of the soil sampling activities to take place in the City of Watertown (City) public Right of Way (ROW) along South 3<sup>rd</sup> street, which sampling had been approved by the City beforehand. The purpose of this sampling was to determine whether PCBs are present in the ROW at these locations, and, if so, at what concentrations.

Pursuant to a WDNR-approved Work Plan and on behalf of SPX, on May 30, 2018 TRC collected one soil sample from 0-12" below ground surface (bgs), and below the sod root line in the city ROW adjacent to each of the properties located at [REDACTED] South 3<sup>rd</sup> Street. Of the four soil samples collected in the ROW for PCB analysis, all exhibited PCB concentrations that were less than the Aroclor 1260 NR 720 Industrial Direct Contact Residual Contaminant Level (RCL) of 1.0 milligram per kilogram (mg/kg); however, three of the samples slightly exceeded the Aroclor 1260 NR 720 Non-Industrial Direct Contact RCL of 0.243 mg/kg. The results of the soil sampling in the City ROW were submitted to the City, WDNR, U.S. Environmental Protection Agency (EPA), and the Wisconsin Department of Health Services (DHS) on June 20, 2018.

As you are aware, the WDNR requested additional soil sampling at [REDACTED] South 3<sup>rd</sup> Street to determine if PCBs are present at these properties. SPX obtained access agreements with the property owners and on December 11, 2018, TRC performed a total of six soil borings at the above-listed properties. From each of the soil borings, eight soil samples were collected at 3-inch intervals from below the sod root line to a depth of two feet

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below the ground surface. The samples were submitted to Pace Analytical Services for laboratory analysis for PCBs.

PCBs were not detected in any of the soil samples collected from the soil borings at the private properties. A summary of the laboratory analytical results is included in Table 1. The results of the soil sampling performed at the above-listed private properties were sent to each of the property owners, WDNR, the City, EPA, and DHS on January 14, 2019,

Figure 1 indicates the locations and results of each soil sample collected from the ROW along South 3<sup>rd</sup> Street and from the adjacent private properties.

The WDNR has requested SPX to remove the soil between the sidewalk and curb in the ROW adjacent to Non-Responsive 3<sup>rd</sup> Street. The soil will be removed to a depth of 1-foot bgs, replaced with clean topsoil, and re-seeded. The areas of soil to be removed are shown on Figure 1.

SPX plans on completing this work in late spring/early summer 2019, as weather conditions allow. Once the schedule has been determined, SPX will submit to the City a Permit to Occupy Street or Sidewalk, a traffic control plan, and applicable fee for approval to perform this work in the City ROW.

If you have any questions, please feel free to contact me at (608) 826-3648, or Jeff Ackerman with the WDNR at (608) 275-3323.

Sincerely,

TRC Environmental Corporation



Ted O'Connell  
Project Manager



Jean Oliva  
Project Engineer, PE

Attachments: Table 1 – PCB Soil Sample Results  
Figure 1 – Soil Sampling/Soil Removal Locations

cc: Jeff Ackerman, WDNR  
Walter Galacki, SPX Corporation  
Peter Ramanauskas, EPA  
Robert Thiboldeaux, DHS

**Table 1**  
**PCB Soil Sample Results**  
**South 3rd Street ROW, Non-Responsive 3rd Street**  
**Watertown, Wisconsin**

SAMPLE ID	SAMPLE COLLECTION DATE	DEPTH RANGE (inches BGS)	PCBs								NR 720 RCL (mg/kg)
			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs	
South 3rd Street ROW											
B-113-0-1	5/30/2018	0-12	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<b>0.37</b>	<b>0.37</b>	0.243
B-114-0-1	5/30/2018	0-12	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<b>0.36</b>	<b>0.36</b>	0.243
B-115-0-1	5/30/2018	0-12	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.20	0.20	0.243
B-116-0-1	5/30/2018	0-12	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<b>0.35</b>	<b>0.35</b>	0.243
1122 South 3rd Street											
B117-0-0.25	12/11/2018	0-3	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	0.243
B117-0.25-0.5	12/11/2018	3-6	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.243
B117-0.5-0.75	12/11/2018	6-9	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B117-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B117-1.0-1.25	12/11/2018	12-15	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B117-1.25-1.50	12/11/2018	15-18	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B117-1.50-1.75	12/11/2018	18-21	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B117-1.75-2.0	12/11/2018	21-24	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-0-0.25	12/11/2018	0-3	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	0.243
B118-0.25-0.5	12/11/2018	3-6	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.243
B118-0.5-0.75	12/11/2018	6-9	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-1.0-1.25	12/11/2018	12-15	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-1.25-1.50	12/11/2018	15-18	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-1.50-1.75	12/11/2018	18-21	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B118-1.75-2.0	12/11/2018	21-24	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-0-0.25	12/11/2018	0-3	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	0.243
B119-0.25-0.5	12/11/2018	3-6	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.243
B119-0.5-0.75	12/11/2018	6-9	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-1.0-1.25	12/11/2018	12-15	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-1.25-1.50	12/11/2018	15-18	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-1.50-1.75	12/11/2018	18-21	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B119-1.75-2.0	12/11/2018	21-24	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B120-0-0.25	12/11/2018	0-3	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	0.243
B120-0.25-0.5	12/11/2018	3-6	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.243
B120-0.5-0.75	12/11/2018	6-9	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B120-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B120-1.0-1.25	12/11/2018	12-15	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
B120-1.25-1.50	12/11/2018	15-18	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
B120-1.50-1.75	12/11/2018	18-21	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
B120-1.75-2.0	12/11/2018	21-24	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
Non-Street											
B121-0-0.25	12/11/2018	0-3	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	0.243
B121-0.25-0.5	12/11/2018	3-6	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B121-0.5-0.75	12/11/2018	6-9	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
B121-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B121-1.0-1.25	12/11/2018	12-15	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B121-1.25-1.50	12/11/2018	15-18	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B121-1.50-1.75	12/11/2018	18-21	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B121-1.75-2.0	12/11/2018	21-24	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
Non-Street											
B122-0-0.25	12/11/2018	0-3	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	0.243
B122-0.25-0.5	12/11/2018	3-6	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B122-0.5-0.75	12/11/2018	6-9	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B122-0.75-1.0	12/11/2018	9-12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B122-1.0-1.25	12/11/2018	12-15	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B122-1.25-1.50	12/11/2018	15-18	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	0.243
B122-1.50-1.75	12/11/2018	18-21	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243
B122-1.75-2.0	12/11/2018	21-24	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	0.243

Notes:

1. NR 720 direct-contact pathway residual contaminant level (RCL) for Aroclor 1260: 0.243 mg/kg (non-industrial).

2. All soil samples collected at the site were taken from below the turf root line (soils only).

3. "<0.14" indicates the constituent was not detected at a detection limit of 0.14 milligrams per kilogram (mg/kg).

4. BGS = Below Ground Surface

5. **Bold** indicates exceedance of default direct-contact pathway RCL for Aroclor 1260: 0.243 mg/kg (non-industrial).

Created by: T. O'Connell 12/31/18

Checked by: L. Auner 1/2/2019

